

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

**Plaintiff,**

**-against-**

**MATTHEW JOHN RYAN and  
PRIME RATE AND RETURN, LLC,  
individually and doing business as  
AMERICAN INTEGRITY FINANCIAL CO.,**

**Defendants.**

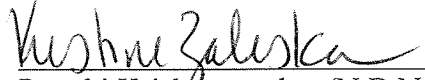
**1:10-CV-0513 (NAM/RFT)**

## NOTICE OF MOTION TO TRANSFER FUNDS FOR DISTRIBUTION

Plaintiff Securities and Exchange Commission (“Commission”) moves for an order directing the Commission to transfer funds currently being held by the Commission or otherwise received in connection with this litigation to the Clerk of this Court for distribution pursuant to an Order of Restitution entered in a parallel criminal action arising out of the same facts as this case, United States v. Matthew Ryan, 10 Cr. 319 (N.D.N.Y). Plaintiff also moves that any future funds that the Commission may collect pursuant to the judgments entered in this case be disbursed directly to the Clerk of this Court until the Order of Restitution is satisfied, without further order of this court.

**WHEREFORE**, the Commission respectfully requests that this Court enter the Proposed Order and grant such other relief that the Court deems just and proper.

Dated: May 29, 2015



Preethi Krishnamurthy (N.D.N.Y. Bar # 516213)

Kristine M. Zaleskas (N.D.N.Y. Bar # 516215)

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